

UNITED STATES COURT OF FEDERAL CLAIMS

Philip C. Ueland, and	)	
Nicole Ueland	)	
Plaintiffs,	)	
	)	v. Civil Action No. 1:23-cv-00931-RTH
	)	
United States of America,	)	
Defendant	)	

**MOTION FOR LEAVE TO FILE  
AMENDED COMPLAINT UNDER SEAL**

Plaintiffs, individuals, by and through their undersigned counsel, hereby move to file an amended complaint under seal:

1. On June 20, 2023, counsel for plaintiffs efiled the complaint in this case under seal.

2. Counsel for plaintiffs attempted to efile other required filings such as a motion for leave to file under seal and statement under Local Rule 9(m)(2)(B) immediately after efilings the complaint, but that attempted efilings was not successful.

3. Counsel for plaintiffs conferred with the Court's efilings help desk and was advised to file an amended complaint and then other required filings such as a motion for leave to file under seal and statement under Local Rule 9(m)(2)(B).

4. Local Rule 9(m) requires that all tax refund claims be filed under seal

along with a redacted version of the complaint or amended complaint.

5. Undersigned counsel has filed both an unredacted version of the amended complaint and a redacted version of the amended complaint.

6. The unredacted version of the amended complaint contains sensitive taxpayer information, including taxpayer identification numbers.

7. To protect sensitive taxpayer information, and to comply with Local Rule 9(m), undersigned counsel respectfully request that the **unredacted version** of the amended complaint be filed under seal.

8. In the interests of public access to judicial records, undersigned counsel respectfully requests that the **redacted version** of the amended complaint not be filed under seal.

Respectfully submitted June 23, 2023,

/s/ Jenny C. Lin

Jenny C. Lin

Lead Attorney for Plaintiffs Philip and Nicole Ueland  
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